

# RECEIVED

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Mr. Jeff DeRouen Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, KY 40602

PUBLIC SERVICE COMMISSION

Louisville Gas and Electric Company

State Regulation and Rates 220 West Main Street PO Box 32010 Louisville, Kentucky 40232 www.eon-us.com

Robert M. Conroy Director - Rates T 502-627-3324 F 502-627-3213 robert.conroy@eon-us.com

August 4, 2010

RE: AN EXAMINATION BY THE PUBLIC SERVICE COMMISSION OF THE ENVIRONMENTAL SURCHARGE MECHANISM OF LOUISVILLE GAS AND ELECTRIC COMPANY FOR THE SIX-MONTH BILLING PERIOD ENDING APRIL 30, 2010 CASE NO. 2010-00242

Dear Mr. DeRouen:

Please find enclosed and accept for filing the original and ten (10) copies of the Direct Testimony of Robert M. Conroy and the Response of Louisville Gas and Electric Company to the Information Requested in Appendix B of the Commission's Order dated July 13, 2010, in the above-referenced matter.

Should you have any questions concerning the enclosed, please contact me at your convenience.

Sincerely,

Robert M. Conroy

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**Enclosures** 

cc: Parties of Record

# COMMONWEALTH OF KENTUCKY

# BEFORE THE PUBLIC SERVICE COMMISSION

# In the Matter of:

AN EXAMINATION BY THE PUBLIC SERVICE	)
COMMISSION OF THE ENVIRONMENTAL	)
SURCHARGE MECHANISM OF LOUISVILLE GAS	) CASE NO.
AND ELECTRIC COMPANY FOR THE SIX-MONTH	) 2010-00242
BILLING PERIOD ENDING APRIL 30, 2010	)

**DIRECT TESTIMONY OF** 

ROBERT M. CONROY DIRECTOR - RATES E.ON U.S. SERVICES INC.

Filed: August 4, 2010

# Q. Please state your name, title, and business address.

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A. My name is Robert M. Conroy. I am the Director – Rates for E.ON U.S. Services
Inc., which provides services to Louisville Gas and Electric Company ("LG&E") and
Kentucky Utilities Company ("KU") (collectively "the Companies"). My business
address is 220 West Main Street, Louisville, Kentucky, 40202. A complete statement
of my education and work experience is attached to this testimony as Appendix A.

# 7 Q. Have you previously testified before this Commission?

A. Yes. I have previously testified before this Commission in proceedings concerning the Companies' most recent rate cases, fuel adjustment clauses, and environmental cost recovery ("ECR") surcharge mechanisms.

# 11 Q. What is the purpose of this proceeding?

12 A. The purpose of this proceeding is to review the past operation of LG&E's
13 environmental surcharge during the six-month billing period ending April 30, 2010
14 (expense months of September 2009 through February 2010) and determine whether
15 the surcharge amounts collected during the period are just and reasonable.

# Q. What is the purpose of your testimony?

A. The purpose of my testimony is to review the operation of LG&E's environmental surcharge during the billing period under review, demonstrate the amounts collected during the period were just and reasonable, present and discuss LG&E's proposed adjustment to the Environmental Surcharge Revenue Requirement based on the operation of the surcharge during the period and explain how the environmental surcharge factors were calculated during the period under review.

- Q. Please review the operation of the environmental surcharge for the billing period
   included in this review.
- A. LG&E billed an environmental surcharge to its customers from November 1, 2009 3 through April 30, 2010. For purposes of the Commission's examination in this case, 4 the monthly LG&E environmental surcharges are considered as of the six-month 5 billing period ending April 30, 2010. In each month of the period, LG&E calculated 6 the environmental surcharge factors by using the costs incurred as recorded on its 7 books and records for the expense months of September 2009 through February 2010 8 and in accordance with the requirements of the Commission's previous orders concerning LG&E's environmental surcharge. 10
- 11 Q. What costs were included in the calculation of the environmental surcharge 12 factors for the billing period under review?

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The capital and operating costs included in the calculation of the environmental surcharge factors for the billing period were the costs incurred each month by LG&E from September 2009 through February 2010, as detailed in the attachment in response to Question No. 2 of the Commission Staff's Request for Information, incorporating all required revisions.

The monthly environmental surcharge factors applied during the billing period under review were calculated consistent with the Commission's orders in LG&E's previous applications to assess or amend its environmental surcharge mechanism and plan, as well as orders issued in previous review cases. The monthly environmental surcharge reports filed with the Commission during this time reflect the various changes to the reporting forms ordered by the Commission from time to time.

# Q. Has the Commission recently approved changes to the environmental surcharge mechanism and the monthly ES Forms?

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In Case No. 2009-00311, LG&E's most recent ECR two-year review, the A. Yes. Commission approved changes to the environmental surcharge mechanism that include the calculation of the monthly billing factor using a revenue requirement method instead of a percentage method (eliminating the use of the Base Environmental Surcharge Factor ("BESF")), the elimination of the monthly true-up adjustment, and revisions to the monthly reporting forms to reflect the approved changes. Pursuant to the Commission's December 2, 2009 Order in that case, the changes were implemented with the December 2009 expense month that was billed in February 2010. The approved changes only impact the timing and accuracy of the revenue collection, not the total revenues LG&E is allowed to collect through the ECR. This six-month review covers three expense months (September 2009, October 2009 and November 2009) which were calculated under the previous percentage method and three expense months (December 2009, January 2010 and February 2010) under the new revenue requirement method.

# 17 Q. What is the primary difference between the previous percentage method using a 18 BESF and the new revenue requirement method?

As explained in detail during past review proceedings and informal conferences, the primary difference is the utilization of actual ECR revenues collected through base rates in the expense month instead of estimated ECR revenues collected through base rates in the billing month (two months later). Under the previous percentage method, the monthly ECR revenue requirement was recovered in the billing month two

months after the expense month through a component in base rates (using BESF as an estimate) and through a billing factor. Under the current revenue requirement method, the monthly ECR revenue requirement is recovered in the <u>expense</u> month through a component in base rates (using actual revenues) and in the <u>billing</u> month two months after the expense month through a billing factor. The change in methodology allows for more timely and accurate recovery of expenses associated with approved ECR projects.

# Q. Does the change in method discussed above result in a transition period during this review proceeding?

A.

Yes. The transition period includes the expense months of December 2009 and January 2010. Under the new revenue requirement method, the monthly ECR filings for the December 2009 and January 2010 expense months consider the ECR revenues collected through base rates in those two months when determining the billing factor for the billing months of February 2010 and March 2010, respectively. However, under the previous percentage method, those same ECR revenues collected through base rates in the months of December 2009 and January 2010 were also considered in the monthly ECR filings for the expense months of October 2009 and November 2009, respectively, to determine the ECR billing factor. Therefore, the ECR revenue collected through base rates for the months of December 2009 and January 2010 were considered twice in determining the ECR billing factors but only received once by LG&E. The impact of this transition period on the recovery position in this review proceeding is further discussed below.

- Q. Has the Commission recently approved changes to LG&E's ECR Compliance
  Plan?
- A. Yes. In Case No. 2009-00198, the Commission approved LG&E's 2009 ECR
  Compliance Plan that included four new projects and associated operation and
  maintenance costs and amended the 2006 Plan to include operation and maintenance
  costs associated with the Air Quality Control System equipment for Trimble County
  Unit 2 (Project 18). Pursuant to the Commission's December 23, 2009 Order, LG&E
  began including the approved projects in the monthly filing for the December 2009
  expense month that was billed in February 2010.
- Q. Are there any changes or adjustments in Rate Base from the originally filed expense months?
- During the period under review, there were no changes to Rate Base from the originally filed billing period as summarized in LG&E's response to the Commission Staff's Request for Information, Question No. 1. In addition, there were no changes identified as a result of preparing responses to the requests for information in this review.
- Q. Are there any changes necessary to the jurisdictional revenue requirement (E(m))?
- 19 A. Yes. Adjustments to E(m) are necessary for compliance with the Commission's
  20 Order in Case No. 2000-00386, to reflect the actual changes in the overall rate of
  21 return on capitalization that is used in the determination of the return on
  22 environmental rate base. The changes in the actual cost of long term debt and capital
  23 structure result in an increase to cumulative E(m) of \$146,360. The details of and

support for this calculation are shown in LG&E's response to Question No. 1 of the Commission Staff's Request for Information.

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Q. With the change in method discussed above, how did LG&E determine the cumulative total over/(under) recovery position for the period under review?

In determining the cumulative total over/(under) recovery position shown in LG&E's response to Question No. 2 of the Commission Staff's Request for Information, the calculations for the three expense months of September 2009, October 2009 and November 2009 (corresponding to the billing months of November 2009, December 2009 and January 2010) are consistent with those contained in prior review proceedings. For each of the expense months, Retail E(m) (allowed ECR revenue requirement) contained in Column 4 of page 2 of 3 was compared to the ECR revenue collected in the corresponding billing month contained in Column 12 (base rate revenues) and Column 13 (ECR billing factor revenue) to determine the over/(under) recovery position in Column 14.

Under the new revenue requirement method, the comparison of the Retail E(m) (allowed ECR revenue requirement) to the revenues received changes. Beginning with the expense month of December 2009 through February 2010, Retail E(m) contained in Column 4 is compared to the ECR revenue collected in the expense month contained in Column 10 (base rate revenues) and the ECR revenue collected in the corresponding billing month contained in Column 13 (ECR billing factor revenue) to determine the over/(under) recovery position in Column 14. As previously discussed, for the transition period (the December 2009 and January 2010 expense months), the amount in Column 10 for the base rate revenues is zero since it was

- already included as revenue in Column 12 of the October 2009 and November 2009 expense months.
- Q. As a result of the operation of the environmental surcharge during the billing period under review, is an adjustment to the revenue requirement necessary?
- Yes. LG&E experienced a cumulative under-recovery of \$5,714,763 for the billing A. 5 period ending April 30, 2010. LG&E's response to Question No. 2 of the 6 Commission Staff's Request for Information shows the calculation of the \$5,714,763 7 cumulative under-recovery. However, LG&E is adjusting this under-recovery 8 position for a correction made outside of the review period in this proceeding that 9 affected the February 2010 expense month. A \$941,134 prior period adjustment was 10 included in the April 2010 expense month filing submitted to the Commission on 11 May 17, 2010. The net under-recovery position which LG&E is requesting in this 12 proceeding is \$4,773,629. Therefore, an adjustment to the revenue requirement is 13 necessary to reconcile the collection of past surcharge revenues with actual costs for 14 15 the billing period under review.
- 16 Q. Why is LG&E making the adjustment discussed above to the recovery position
  17 contained in this review period?
- In the April 2010 expense month filing submitted to the Commission on May 17, 2010, LG&E identified an error in the amount of ECR revenue collected through base rates for the February 2010 expense month filing that resulted in an under-collection for February 2010 expenses. The February 2010 expense month filing included \$3,581,611 as the amount collected through base rates; however, the correct amount is \$2,640,477 as shown in Column 10, page 2 of 3 of LG&E's response to Question

No. 2 of the Commission Staff's Request for Information. This overstatement resulted in an under-collection of \$ 941,134 through the April 2010 ECR billing factor. This under-collection was included in the April 2010 expense month filing and recovered through the June 2010 billing factor. Therefore, LG&E is adjusting this out of the cumulative over/(under) recovery position for this review proceeding.

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# Q. Has LG&E identified the causes of the net under-recovery during the billing period under review?

Yes. Consistent with the issues discussed in the past several review proceedings, LG&E has identified four components that make up the net under-recovery during the billing period under review. The components are (1) changes in overall rate of return, (2) the difference between the calculation of BESF in the review case and application of BESF in the monthly filings beginning with the March 2008 expense month, (3) the use of the BESF percentage in determining the amount collected in base rates, and (4) the use of 12 month average revenues to determine the billing factor. In addition, as discussed above, LG&E has identified two additional components contributing to the under-recovery position in this period. The first is the "transition period" resulting from the change in methodology and the second is the error contained in the February 2010 expense month filing that was identified in April 2010. The details and support of the components that make up the net under-recovery during the billing period under review are shown in LG&E's response to Question No. 2 of the Commission Staff's Request for Information. The table below summarizes the components of the under-recovery position.

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OVER/UNDER RECONCILIAT	ΓΙΟΝ	
Combined Over/Under Recovery		(5,714,763)
Due to BESF Calculation Differences	(262,553)	
Due to use of BESF %	(344,185)	
Due to Change in ROR	(146,360)	
Use of 12-Month Average Revenues	62,884	
Due to Feb10 Expense Mo. Correction	(941,134)	
Transition Months	(4,083,414)	
Subtotal	-	(5,714,763)
Unreconciled Difference		-

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# 3 Q. Please explain the change in rate of return.

- 4 A. As previously stated, the cumulative impact of the revised rate of return resulted in an increase to the jurisdictional revenue requirement and an under-recovery of \$146,360.
- 6 Q. Please explain the components related to the BESF.
- A. The use of the BESF only affects the first three months of the review period. As discussed in prior review proceedings, one component is the result of a difference between the calculation of the BESF in the previous 2-year review case and the application of the BESF in the monthly filings. This component contributed to the under-recovery in the amount of \$262,553. In addition, use of the BESF percentage to estimate the amount collected through base rates resulted in an under-recovery of \$344,185.

# Q. Please explain how the function of the ECR mechanism contributes to the net under-recovery in the billing period under review?

A.

The use of 12-month average revenues to calculate the monthly billing factor and then applying that same billing factor to the actual monthly revenues will result in an over or under-collection of ECR revenues. Typically it will result in an over-collection during the summer or winter months when actual revenues will generally be greater than the 12-month average and an under-collection during the shoulder months when actual revenues will generally be less than the 12-month average. In the billing period under review, the use of 12-month average revenues resulted in an over-recovery of \$62,884.

During the period under review, LG&E's actual revenues did not significantly vary from the 12-month historical average. The table below shows a comparison of the 12-month average revenues used in the monthly filings to determine the ECR billing factor and the actual revenues which the ECR billing factor was applied in the billing month.

Expense Month	12-month Average	Billing Month	Actual Revenue
_	Revenue		ECR applied to
September 2009	\$63,427,590	November 2009	\$50,146,971
October 2009	\$63,384,159	December 2009	\$57,140,552
November 2009	\$62,919,904	January 2010	\$67,468,632
December 2009	\$62,728,525	February 2010	\$63,628,594
January 2010	\$62,962,163	March 2010	\$62,521,754
February 2010	\$63,063,357	April 2010	\$56,355,072

Q. What is the amount of the recovery position related to the two additional components discussed above?

- A. As shown in the summary table above and on page 3 of LG&E's response to
  Question No. 2 of the Commission Staff's Request for Information, the underrecovery from the transition period was \$4,083,414 and as previously discussed, the
  error in the February 2010 expense month resulted in an under-recovery of \$941,134.
- What kind of adjustment is LG&E proposing in this case as a result of the operation of the environmental surcharge during the billing period?
- 7 A. LG&E is proposing that the net under-recovery position of \$4,773,629 be recovered over the six months following the Commission's Order in this proceeding. 8 Specifically, LG&E recommends that the Commission approve an increase to the 9 Environmental Surcharge Revenue Requirement of \$795,605 per month for the first 10 five months and \$795,604 per month for the following one month, beginning in the 11 second full billing month following the Commission's Order in this proceeding. This 12 method is consistent with the method of implementing previous over- or under-13 recovery positions in prior ECR review cases. 14
- 15 Q. What is the bill impact on a residential customer for the proposed collection of the under-recovery?
- 17 A. LG&E is proposing to collect the under-recovery of \$4,773,629 in a six month period.

  18 The inclusion of \$795,605 per month in the determination of the ECR billing factor

  19 will increase the billing factor by approximately 1.23%. For a residential customer

  20 using 1,000 kWh the ECR billing factor will increase by approximately \$0.95 per

  21 month for six months (using rates and adjustment clause factors in effect for the

  22 August 2010 billing month).

- Q. What rate of return is LG&E proposing to use for all ECR Plans upon the Commission's Order in this proceeding?
- A. LG&E is recommending an overall rate of return on capital of 11.18%, including the currently approved 10.63% return on equity and adjusted capitalization, to be used to calculate the environmental surcharge. This is based on capitalization as of February 28, 2010 and the Commission's Order of July 30, 2010 in Case No. 2009-00549.

# 7 O. What is your recommendation to the Commission in this case?

- 8 A. LG&E makes the following recommendations to the Commission in this case:
  - a) The Commission should approve the proposed increase to the Environmental Surcharge Revenue Requirement of \$795,605 per month for the first five months and \$795,604 per month for the following one month beginning in the second full billing month following the Commission's Order in this proceeding;
    - b) The Commission should determine environmental surcharge amount for the six-month billing period ending April 30, 2010 to be just and reasonable;
- The Commission should approve the use of an overall rate of return on capital of 11.18% using a return on equity of 10.63% beginning in the second full billing month following the Commission's Order in this proceeding.

# 19 Q. Does this conclude your testimony?

20 A. Yes.

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# VERIFICATION

COMMONWEALTH OF KENTUCKY	)	SS
COUNTY OF JEFFERSON	)	

The undersigned, **Robert M. Conroy**, being duly sworn, deposes and says that he is Director - Rates for E.ON U.S. Services, Inc., and that he has personal knowledge of the matters set forth in the foregoing testimony, and that the answers contained therein are true and correct to the best of his information, knowledge and belief.

Robert M. Conroy

Victoria B. Harper (SEAL)
Jotary Public

My Commission Expires:

Sept 20,20/0

### APPENDIX A

# Robert M. Conroy

Director - Rates E.ON U.S. Services Inc. 220 West Main Street Louisville, Kentucky 40202 (502) 627-3324

# **Education**

Masters of Business Administration

Indiana University (Southeast campus), December 1998. GPA: 3.9.

Bachelor of Science in Electrical Engineering;

Rose Hulman Institute of Technology, May 1987. GPA: 3.3

Essentials of Leadership, London Business School, 2004.

Center for Creative Leadership, Foundations in Leadership program, 1998.

Registered Professional Engineer in Kentucky, 1995.

# **Previous Positions**

Manager, Rates	April 2004 – Feb. 2008
Manager, Generation Systems Planning	Feb. 2001 – April 2004
Group Leader, Generation Systems Planning	Feb. 2000 – Feb. 2001
Lead Planning Engineer	Oct. 1999 – Feb. 2000
Consulting System Planning Analyst	April 1996 – Oct. 1999
System Planning Analyst III & IV	Oct. 1992 - April 1996
System Planning Analyst II	Jan. 1991 - Oct. 1992
Electrical Engineer II	Jun. 1990 - Jan. 1991
Electrical Engineer I	Jun. 1987 - Jun. 1990

# **Professional/Trade Memberships**

Registered Professional Engineer in Kentucky, 1995.

# COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

## In the Matter of:

AN EXAMINATION BY THE PUBLIC SERVICE	)	
COMMISSION OF THE ENVIRONMENTAL	)	
SURCHARGE MECHANISM OF LOUISVILLE GAS	)	CASE NO.
AND ELECTRIC COMPANY FOR THE SIX-MONTH	)	2010-00242
BILLING PERIOD ENDING APRIL 30, 2010	)	

RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
TO
INFORMATION REQUESTED IN
APPENDIX B OF COMMISSION'S ORDER
DATED JULY 13, 2010

FILED: August 4, 2010

# **VERIFICATION**

COMMONWEALTH OF KENTUCKY	)	
	)	SS
COUNTY OF JEFFERSON	)	

The undersigned, **Robert M. Conroy**, being duly sworn, deposes and says that he is Director - Rates for E.ON U.S. Services, Inc., and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

Robert M. Conroy

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 209 day of 2010.

Victoria B. Houser (SEAL) Notary Public

My Commission Expires:

Sept 20, 2010

### **VERIFICATION**

COMMONWEALTH OF KENTUCKY	)	
	)	SS:
COUNTY OF JEFFERSON	)	

The undersigned, **Shannon L. Charnas**, being duly sworn, deposes and says that she is Director – Utility Accounting and Reporting for E.ON U.S. Services, Inc., and that she has personal knowledge of the matters set forth in the responses for which she is identified as the witness, and the answers contained therein are true and correct to the best of her information, knowledge and belief.

HONM X MONAS Shannon L. Charnas

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 3rd day of 2010.

Vectoria B. Harper (SEAL) Notary Public

My Commission Expires:

Sept 20, 2010

### LOUISVILLE GAS AND ELECTRIC COMPANY

# Response to Information Requested in Appendix B of Commission's Order Dated July 13, 2010

Case No. 2010-00242

## Question No. 1

Witness: Robert M. Conroy / Shannon L. Charnas

Q-1. Concerning the rate of return on the five amendments to the environmental compliance plan, for the period under review, calculate any true-up adjustment needed to recognize changes in LG&E's cost of debt, preferred stock, accounts receivable financing (if applicable), or changes in LG&E's jurisdictional capital structure. Include all assumptions and other supporting documentation used to make this calculation. Any true-up adjustment is to be included in the determination of the over- or under-recovery of the surcharge for the corresponding billing period under review.

### A-1. Please see the attachment.

LG&E calculated the true-up adjustment to recognize changes in the cost of debt and capital structure in two steps, shown on Pages 1 and 2 of the attachment to this response. Page 1 reflects the true-up required due to the changes between the Rate Base as filed and the Rate Base as Revised through the Monthly Filings. However, during the period under review there were no revisions to reflect. Page 2 represents the true-up in the Rate of Return as filed compared to the actual Rate of Return calculations. No further revisions to Rate Base were identified during this review period.

Page 3 provides the adjusted weighted average cost of capital for the period under review.

LG&E did not engage in accounts receivable financing or have any preferred stock during the period under review.

### Louisville Gas & Electric Company Overall Rate of Return True-up Adjustment - Revised Rate Base Impact on Calculated E(m)

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	, (9)
Billing Month	Expense Month	Rate of Return as Filed	Rate Base as Filed	Rate Base As Revised	Change in Rate Base	True-up Adjustment	Jurisdictional Allocation, ES Form 1 00	Jursidictional True up Adjustment
					(5) - (4)	(3) * (6) / 12		(7) * (8)
Nov-09	Sep-09	10.82%	\$240,832,072	\$240,832,072	\$ -	\$ -	89.48%	\$ -
Dec-09	Oct-09	10.82%	240,117,179	240,117,179	*	•	86.71%	-
Jan-10	Nov-09	10.82%	239,518,331	239,518,331	-	-	83 79%	-
Feb-10	Dec-09	11.18%	241,367,963	241,367,963	-	•	84.48%	-
Mar-10	Jan-10	11 18%	240,780,684	240,780,684	-	-	86.20%	-
Apr-10	Feb-10	11.18%	240,159,906	240,159,906	-	•	80.32%	-
						\$ -		\$ -
				Cumulative Impact of Cl	hanges in Rate Base	e_\$		\$ -

### Louisville Gas & Electric Company Overall Rate of Return True-up Adjustment - Revised Rate of Return Impact on Calculated E(m)

(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Expense Month	Rate of Return as Filed	Rate of Return as Revised	Change in Rate of Return	Rate Base as Revised	True-up Adjustment	Jurisdictional Allocation, ES Form 1.00	Jursidictional True up Adjustment
			(4) - (3)		(5) * (6) / 12		(7) * (8)
Sep-09	10.82%	11.14%	0.32%	\$ 240,832,072	64,222	89 48%	57,466
Oct-09	10 82%	11.14%	0.32%	240,117,179	64,031	86 71%	55,521
Nov-09	10.82%	11.14%	0.32%	239,518,331	63,872	83 79%	53,518
Dec-09	11 18%	11 14%	-0 04%	241,367,963	(8,046)	84.48%	(6,797)
Jan-10	11 18%	11 14%	-0 04%	240,780,684	(8,026)	86.20%	(6,918)
Feb-10	11.18%	11.14%	-0 04%	240,159,906	(8,005)	80 32%	(6,430)
					168,048		146,360
					M N W 3 3 3 3 3 3 4 4 4 4 4 4 4 4 4 4 4 4 4	· · · · · · · · · · · · · · · · · · ·	
		Curr	nulative Impact of Ch	anges in Rate of Return	\$ 168,048		\$ 146,360
	Expense Month  Sep-09 Oct-09 Nov-09 Dec-09 Jan-10	Expense Month Rate of Return as Filed  Sep-09 10 82% Oct-09 10 82% Nov-09 10 82% Dec-09 11 18% Jan-10 11 18%	Expense Month         Rate of Return as Filed         Rate of Return as Revised           Sep-09         10 82%         11 14%           Oct-09         10 82%         11 14%           Nov-09         10 82%         11 14%           Dec-09         11 18%         11 14%           Jan-10         11 18%         11 14%           Feb-10         11 18%         11 14%	Expense Month as Filed Rate of Return as Return Return  (4) - (3)  Sep-09 10 82% 11 14% 0 32% Oct-09 10 82% 11 14% 0 32% Nov-09 10 82% 11 14% 0 32% Dec-09 11 18% 11 14% -0 04% Jan-10 11 18% 11 14% -0 04% Feb-10 11 18% 11 14% -0 04%	Expense Month as Filed Return as Revised Return as Return Rate of Return Rate of Return Rate Base as Revised  (4) - (3)  Sep-09 10 82% 11 14% 0 32% \$ 240,832,072 Oct-09 10 82% 11 14% 0 32% 240,117,179 Nov-09 10 82% 11 14% 0 32% 239,518,331 Dec-09 11 18% 11 14% -0 04% 241,367,963 Jan-10 11 18% 11 14% -0 04% 240,780,684 Feb-10 11 18% 11 14% -0 04% 240,159,906	Expense Month         Rate of Return as Filed         Rate of Return as Revised         Change in Rate of Return Rate of Return Rate Base as Revised         True-up Adjustment           Sep-09         10 82%         11 14%         0 32%         \$ 240,832,072         64,222           Oct-09         10 82%         11 14%         0 32%         240,117,179         64,031           Nov-09         10 82%         11 14%         0 32%         239,518,331         63,872           Dec-09         11 18%         11 14%         -0 04%         241,367,963         (8,046)           Jan-10         11 18%         11 14%         -0 04%         240,780,684         (8,026)           Feb-10         11 18%         11 14%         -0 04%         240,159,906         (8,005)           168,048	Expense Month Rate of Return as Filed Revised Revised Return as Filed Revised Return Rate of Return Rate Base as Revised True-up Adjustment Form 1 00    Cot-09

# LOUISVILLE GAS AND ELECTRIC COMPANY

# Adjusted Electric Rate of Return on Common Equity As of April 30, 2010

Cost of Capital (Col8 x Col7) (9)		0.01%	2.06%	5.84%	7.91%
Annual Cost Rate (8)		0.21%	5.24%	10.63%	
Adjusted Capital Structure (7)	! 	5.85%	39.24%	54.91%	100.000%
Adjusted Electric Capitalization (Cal 4 - Cal 3) (6)	***	\$ 108,800,077	730,342,098	1,021,992,635	\$ 1.861.134,810
Adjustments to Capitalization (col 17) (5)		2,621,017	17,580,976	24,601,717	44,803,710
Electric Capitalization (Collx Col3) (4)	***************************************	\$ 090,671,901	712,761,122	816'06'218	1.816,331,100 \$
Electric Rate Base Percentage (3)		79.540% \$	79.540%	79.540%	
Capital Structure (2)	***************************************	5.85%	39,24%	54.91%	100.000%
Per Books 04-30-10 (1)		\$ 133,491,400	896,104,000	1,253,948,853	\$ 2,283,544,253
	ELECTRIC	1. Short Term Debt	2. Long Term Debt	3. Common Equity	4. Totaí Capıtalizatıon

5. Weighted Cost of Capital Grossed up for Income Tax Effect {ROR + (ROR - DR) x [TR / (1 - TR)]}

11.14%

Capit	ELECTRIC	I. Short Term Debt \$ 10	Long Term Debt 71	Common Equity 99	4. Total Capitalization \$ 1.81
Capitalization (Col 4)		090'621'90	112,761,122	816,095,766	,816,331,100
Capital Structure		5.85%	39.24%	54.91%	100.000%
Trimb Inven (Col 11 x		S	Ŭ	Ŭ	8
Trimble County Inventories (a) (col 11 x Col 12 Line 4) (12)		(250,134)	1,677,825)	(2,347,844)	(4.275,803)
Investments in OVEC & Other (Col 11 x Col 13 Line 4)		\$ (35,461)	(237,859)	(332,845)	\$ (606,165)
		1) S	(6	2)	S
JDIC (Col 11 x Col 14 Linc 4) (14)		1,325,283	8,889,594	12,439,541	22,654,418
Environmental Surcharge (Net of ECR Roll-in) (col11 x Col15 Line 4)		S	1,2	1.8	\$ 3.2
rental rge Roll-in) 5 Linc 4)		191,954	,287,566	1,801,740	3,281,260
Advanced Coal Investment Tax Credit (b) (Cel 11 x Cel 16 Line 4)		s 1,38	9,31	13,04	\$ 23,7
Coal ent t (b) Line 4)		1,389,375	9,319,500	13,041,125	23,750,000
To		S			S
Total Adjustments To Capital		2,621,017	926'085'21	24,601,717	44,803,710

 (a) Trimble County Inventories
 As of April 30, 2010
 \$ 4,626,283

 Stores Expense
 742,638

 Coal
 11,006,104

 Limestone
 11,006,104

 Fuel Oil
 407,540

 Emission Allowances
 115,106,104

 Total Trimble County Inventories
 5 17,103,213

 Multiplied by Disallowed Portion
 25,000%

 Trimble County Inv. Disallowed
 5 4,275,803

(b) Reflects Investment Tax Credit treatment per Case No. 2007-00179.

### LOUISVILLE GAS AND ELECTRIC COMPANY

# Response to Information Requested in Appendix B of Commission's Order Dated July 13, 2010

Case No. 2010-00242

Question No. 2

Witness: Robert M. Conroy

- Q-2. Prepare a summary schedule showing the calculation of Total E(m), Net Retail E(m), and the surcharge factor for the expense months covered by the applicable billing period. Include the two expense months subsequent to the billing period in order to show the over- and under-recovery adjustments for the months included in the billing period under review. The summary schedule is to incorporate all corrections and revisions to the monthly surcharge filings LG&E has submitted during the billing period under review. Include a calculation of any additional over- or under-recovery amount LG&E believes needs to be recognized for the six-month review. Include all supporting calculations and documentation for any such additional over- or under-recovery.
- A-2. Please see the attachment to this response for the summary schedule and cumulative components which make up the net under-recovery.

In Case No. 2009-00311, LG&E's most recent ECR two-year review, the Commission approved changes to the environmental surcharge mechanism that include the calculation of the monthly billing factor using a revenue requirement method instead of a percentage method (eliminating the use of BESF), the elimination of the monthly true-up adjustment, and revisions to the monthly reporting forms to reflect the approved changes. Pursuant to the Commission's December 2, 2009 Order, the changes were implemented with the December 2009 expense month that was billed in February 2010.

In determining the cumulative total over/(under) recovery position, the calculations for the three expense months of September 2009, October 2009 and November 2009 (corresponding to the billing months of November 2009, December 2009 and January 2010) are consistent with those contained in prior review proceedings. For each of the expense months, Retail E(m) contained in Column 4 of page 2 of 3 was compared to the ECR revenue collected in the corresponding billing month contained in Column 12 (base rate revenues) and Column 13 (ECR billing factor revenue) to determine the over/(under) recovery position in Column 14.

Under the new revenue requirement method, the comparison of the Retail E(m) (allowed ECR revenue requirement) to the revenues received changes. Beginning with the expense month of December 2009 through February 2010, Retail E(m) contained in Column 4 is compared to the ECR revenue collected in the expense month contained in Column 10 (base rate revenues) and the ECR revenue collected in the corresponding billing month contained in Column 13 (ECR billing factor revenue) to determine the over/(under) recovery position in Column 14. For the transition period (the December 2009 and January 2010 expense months), the amount in Column 10 for the base rate revenues is zero since it was already included as revenue in Column 12 of the October 2009 and November 2009 expense months.

The approved changes only impact the timing and accuracy of the revenue collection, not the total revenues LG&E is allowed to collect through the ECR as a result of the changes.

For the period under review, LG&E experiences a cumulative under-recovery of \$5,714,763. However LG&E is adjusting this under-recovery position for a correction made outside of the review period that affected the February 2010 expense month as shown on page 2 of 3 on the attached schedule. The original February 2010 expense month filing included an overstatement of the ECR revenue collected through base rates, resulting in an under-recovery of \$941,134. The adjustment to correct the overstatement was shown as a prior period adjustment in the April 2010 expense month filing and was recovered through the June 2010 billing factor. Since the two months at issue are in different six-month periods, LG&E included the adjustment in this review period to avoid compounding the over/under recovery for its customers. The result is a net under-recovery of \$4,773,629 for the 6-month billing period under review.

Attachment to Response to Question No. 2
Page 1 of 3
Conroy

Louisville Gas & Electric Company Calculation of E(m) and Jurisdictional Surcharge Billing Factor Summary Schedule for Expense Months September 2009 through February 2010

	Comments: As Revised in This Review		51	34	28	62	32	91	
(8)	Retail E(m)	(2) * (9)	3,274,715	2,970,83	2,865,15	3,110,17	3,020,08	2,835,916	
(7)	Retail Allocation Ratio	(3) * (4) + (5) ES Form 1.10	89.48%	86.71%	83.79%	84.48%	86.20%	80.32%	
(9)	Total E(m)	(3) * (4) + (5)	3,659,717	3,426,173	3,419,452	3,681,556	3,503,575	3,530,772	
(5)	Operating Expenses (net of allowance proceeds)	ES Form 2.00	1,423,993	1,197,085	1,195,923	1,440,857	1,268,328	1,301,288	
(4)	Rate of Return as Revised		11.14%	11.14%	11.14%	11.14%	11.14%	11.14%	
(3)	Monthly Rate Base as Revised	(2) / 12	20,069,339	20,009,765	19,959,861	20,113,997	20,065,057	20,013,326	120,231,345
(2)	Rate Base as Revised	ES Form 2.00	240,832,072	240,117,179	239,518,331	241,367,963	240,780,684	240,159,906	1,442,776,135
(1)	Expense Month		Sep-09	Oct-09	Nov-09	Dec-09	Jan-10	Feb-10	

Attachment to Response to Question No. 2
Page 2 of 3
Conroy

Louisville Gas & Electric Company Calculation of E(m) and Jurisdictional Surcharge Billing Factor Summary Schedule for Expense Months September 2009 through February 2010

0	(2)	(3)	(7)	(5)	(9)	(7)	(8)	(6)	(10)	(11)	(12)	(13)	(14)
:	į						Monthly				ECR Revenue		
		Adjustment to Retail	Adjustment to Retail Retail E(m) Including		Current Environmental	Base Environmental	Environmental		ECR Revenue		Recovered		
Expense		E(m) for Under-	all Adjustments to be	Average Monthly	Surcharge Factor	Surcharge Factor	Surcharge Factor		Recovered Through	Billing	Through Base	ECR Billing Factor	Combined Total
Month	Retail E(m)	Collection	billed as ECR	Retail Revenues	(CESF)	(BESF)	(MESF)	Billing Factor	Base Rates	Period	Rates	Revenues	Over/(Under) Recovery
											Revenue		(4) - (12) - (13)
		Case Nos. 08-549 &							Percentage Method		Requirement Sec		10
		09-311		ES Form 1.10	As Filed		(2) - (9)	As Filed	See Note 1 & 2		Note 1 & 2		(4) - (10) - (13)
Scp-09	3,274,715	202,846	3,477,561	63,427,590	5.16%	3.62%	1.54%			Nov-09	1,646,138	761,325	(1,070,098
Oct-09	2,970,834		2,970,834	63,384,159		3.62%	1.30%			Dec-09	1,869,544	749,427	(351,863
Nov-09	2,865,158	0	2,865,158	62,919,904	5.59%	3.62%	1.97%			Jan-10	2,213,870	1,306,389	101,559
Dcc-09	3,110,179			62,728,525				2.86%		Fcb-10		1,807,451	(1,848,124)
Jan-10	3,020,082		•	62,962,163				2.16%		Mar-10		1,403,818	(2,161,660
Feb-10	2,835,916	545,397	3,381,313	63,063,357				-0.31%	2,640,477	Apr-10		(197,282)	(938,118)
	18,076,885		19,915,920				Sub Total		2,640,477		5,729,553	5,831,128	(5,714,763)
					Correction to Feb 16	Correction to Feb 10 expense month filed with Apr 10 monthly filing	h Apr 10 monthly filing	,,,					941,134
						•							
							Grand Total						(4,773,629)

Beginning with the Dec09 expense month, LG&E transitioned to the Revenue Requirement methodology approved in Case No. 2009-00310 Note 1:

The ECR Revenue recovered through Base Rates in February 2010 was revised from the originally filed amount. Note 2:

Louisville Gas & Electric Company Reconciliation of Combined Over/(Under) Recovery Summary Schedule for Expense Months September 2009 through February 2010

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	
			Rate of Return as	Change in Rate of		Impact of change	Jurisdictional Allocation.		
Billing Month	Expense Month	Rate of Return as Filed	Revised	Return (4) - (3)	Rate Base as Revised		ES Form 1 00	Jursidictional Impact (7) * (8)	
Nov-09	Sep-09	10 82%	11 14%	0 32%	\$240,832,072	(64,222)	89.48%	(57,466)	
Dec-09	Oct-09	10.82%	11 14%	0 32%	240,117,179	(64,031)	86 71%	(55,521)	
Jan-10	Nov-09	10.82%	11 14%	0 32%	239,518,331	(63,872)	83.79%	(53,518)	
Feb-10	Dec-09	11 18%	11 14%	-0 04%	241,367,963	8,046	84 48% 86 20%	6,797	
Mar-10 Apr-10	Jan-10 Feb-10	11 18% 11 18%	11 14% 11 14%	-0 04% -0 04%	240,787,381 240,159,906	8,026 8,005	80 32%	6,919 6,430	
Apr-10	1 65-10	11 1070	11 1470	-0 0470	240,139,900		00 3270	0,430	
			Cun	nulative Impact of Ch	anges in Rate of Return	\$ (168,048)		\$ (146,360)	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
(.,	(-)	(-)		(-7		· · /			
		Base Rate Revenues (from ES Form 3 00)	As filed BESF * Base Rates (from ES Form 2 00)	Actual ECR Base Rates (Q2, pg 2, Col 12)	As Filed BESF (from ES Form 1 00)	Recalculated BESF	Recalc BESF * Base Rates (3) * (7)	Recalculated Difference (8) - (4)	BESF % Difference (5) - (8)
Nov-09	Sep-09	50,029,237	1,811,058	1,646,138	3 62%	3 47%	1,736,015	(75,043)	(89,877)
Dec-09	Oct-09	58,143,434	2,104,792	1,869,544	3 62%	3 47%	2,017,577	(87,215)	(148,033)
Jan-10	Nov-09	66,862,994	2,420,440	2,213,870	3 62%	3 47%	2,320,146	(100,294)	(106,276)
Feb-10	Dec-09	•	•	•			-	•	-
Mar-10 Apr-10	Jan-10 Feb-10	-		•			•	-	-
Apr-10	160-10	175,035,666	6,336,291	5,729,553		-	6,073,738	(262,553)	(344,185)
	Actu	al Base Rate Collections	5,729,553	. ,	Actual Bas	e Rate Collections	5,729,553	. , ,	. , ,
			(606,738)				(344,185)		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	
(-)	\- <i>/</i>			Re	covery Position Explana				
		0 11 12 11							
D30	F	Combined Total Over/(Under)		BESF Calculation		Use of 12 Month Average	Correction to Feb10 Expense	Transition Months - ECR Rev collected	
Billing Month	Expense Month	Recovery	ROR Trueup	Differences	Use of BESF %	Revenues	Month Filing	through Base Rates	
1410/1111	14101101	(Q2, pg 2, Col 14)	reore tradap	Differences	030 01 22301 70	140 4011403		unough Dust runes	
Nov-09	Sep-09	(1,070,098)	(57,466)	(75,043)	(89,877)	(847,712)			
Dec-09	Oct-09	(351,863)	(55,521)	(87,215)	(148,033)	(61,094)			
Jan-10 Feb-10	Nov-09 Dec-09	655,101 (1,848,124)	(53,518) 6,797	(100,294)	(106,276)	915,189 14,624		(1,869,544)	
Mar-10	Jan-10	(2,161,660)	6,919	-	-	45,291		(2,213,870)	
Apr-10	Feb-10	(938,118)	6,430	-		(3,414)	(941,134)	(-,,	
•									
		(5,714,763)	(146,360)	(262,553)	(344,185)	62,884	(941,134)	(4,083.414)	
Feb10 Expens	se Mo Correction	941,134							
Net Over/	(Under) Recovery	(4,773.629)							
			OVER/UND	ER RECONCILIA	TION				
			Combined Ov	er/(Under) Recovery		(5,714,763)			
				lculation Differences					
				ue to use of BESF %					
				ie to Change in ROR					
		1		h Average Revenues bense Mo Correction	62,884 (941,134)				
		Tra	insition Months - ECR R						
					v. comment of the state of the	·			
				Subtotal		(5,714,763)			
			I In.	econciled Difference					
		<del></del>							

### LOUISVILLE GAS AND ELECTRIC COMPANY

# Response to Information Requested in Appendix B of Commission's Order Dated July 13, 2010

Case No. 2010-00242

Question No. 3

Witness: Shannon L. Charnas

- Q-3. Provide the calculations, assumptions, workpapers, and other supporting documents used to determine the amounts LG&E has reported during each billing period under review for Pollution Control Deferred Income Taxes.
- A-3. LG&E calculates Deferred Income Taxes as the taxable portion of the difference between book depreciation, using straight line depreciation, and tax depreciation, generally using 20 year MACRS accelerated depreciation or 5 or 7 year rapid amortization. Accelerated depreciation results in a temporary tax savings to the Company and the Accumulated Deferred Tax balance reflects the value of those temporary savings as a reduction to environmental rate base.

See the attachment for the calculation of Deferred Income Taxes and the balance of Accumulated Deferred Income Taxes reported each month of the review period.

# Louisville Gas and Electric Company Deferred Tax Calculations Environmental Compliance Plans, by Approved Project

2001 Plan Project 6 -- NOx

Month	Plant Balance	Book Depreciation	Tax Depreciation	Temporary Difference	Income Tax Rate	Deferred Tax	Accumulated Deferred Taxes	Deferred Taxes on Retirements
							13,303,264	
Sep-09	192,860,844	617,234	843,207	225,973	38.9000%	87,903	13,391,167	1,053,265
Oct-09	192,860,844	617,234	843,207	225,973	38.9000%	87,903	13,479,070	1,053,265
Nov-09	192,860,844	617,234	843,207	225,973	38.9000%	87,903	13,566,973	1,053,265
Dec-09	192,860,844	617,234	843,207	225,973	38.9000%	87,903	13,654,876	1,053,265
Jan-10	192,860,844	617,234	788,995	171,761	38.9000%	66,815	13,721,691	1,053,265
Feb-10	192,860,844	617,234	788,995	171,761	38.9000%	66,815	13,788,507	1,053,265

# Louisville Gas and Electric Company Deferred Tax Calculations Environmental Compliance Plans, by Approved Project

2003 - Plan Project 7 -- Mill Creek FGD Scrubber Conversion

Month	Plant Balance	Book Depreciation	Tax Depreciation	Temporary Difference	Income Tax Rate	Deferred Tax	Accumulated Deferred Taxes	Deferred Taxes on Retirements
							990,600	
Sep-09	30,861,686	103,474	131,889	28,415	38.9000%	11,053	1,001,653	516,073
Oct-09	30,861,686	103,474	131,889	28,415	38.9000%	11,053	1,012,706	516,073
Nov-09	30,861,686	103,474	131,889	28,415	38.9000%	11,053	1,023,759	516,073
Dec-09	30,861,686	103,474	131,889	28,415	38.9000%	11,053	1,034,812	516,073
Jan-10	30,861,686	103,474	121,988	18,514	38.9000%	7,202	1,042,014	516,073
Feb-10	30,861,686	103,474	121,988	18,514	38.9000%	7,202	1,049,218	516,073

# Louisville Gas and Electric Company Deferred Tax Calculations Environmental Compliance Plans, by Approved Project

2003 - Plan Project 8 -- Precipitators

Month	Plant Balance	Book Depreciation	Tax Depreciation	Temporary Difference	Income Tax Rate	Deferred Tax	Accumulated Deferred Taxes	Deferred Taxes on Retirements
							940,181	
Sep-09	11,929,133	47,792	48,724	932	38.9000%	363	940,544	275,252
Oct-09	11,929,133	47,792	48,724	932	38.9000%	363	940,907	275,252
Nov-09	11,929,133	47,792	48,724	932	38.9000%	363	941,270	275,252
Dec-09	11,929,133	47,792	48,724	932	38.9000%	363	941,633	275,252
Jan-10	11,929,133	47,792	46,609	(1,183)	38.9000%	(460)	941,173	275,252
Feb-10	11,929,133	47,792	46,609	(1,183)	38.9000%	(460)	940,713	275,252

2003 - Plan Project 9 -- Clearwell Water System

Month	Plant Balance	Book Depreciation	Tax Depreciation	Temporary Difference	Income Tax Rate	Deferred Tax	Accumulated Deferred Taxes	Deferred Taxes on Retirements
							26,964	
Sep-09	1,197,310	3,702	4,877	1,175	38.9000%	457	27,421	4,716
Oct-09	1,197,310	3,702	4,877	1,175	38.9000%	457	27,878	4,716
Nov-09	1,197,310	3,702	4,877	1,175	38.9000%	457	28,335	4,716
Dec-09	1,197,310	3,702	4,877	1,175	38.9000%	457	28,792	4,716
Jan-10	1,197,310	3,702	4,517	815	38.9000%	317	29,109	4,716
Feb-10	1,197,310	3,702	4,517	815	38.9000%	317	29,424	4,716

2003 - Plan Project 10 -- Absorber Trays

Month	Plant Balance	Book Depreciation	Tax Depreciation	Temporary Difference	Income Tax Rate	Deferred Tax	Accumulated Deferred Taxes	Deferred Taxes on Retirements
							74,528	
Sep-09	2,734,620	8,614	10,168	1,554	38.9000%	605	75,133	-
Oct-09	2,734,620	8,614	10,168	1,554	38.9000%	605	75,738	-
Nov-09	2,734,620	8,614	10,168	1,554	38.9000%	605	76,343	_
Dec-09	2,734,620	8,614	10,168	1,554	38.9000%	605	76,948	-
Jan-10	2,734,620	8,614	10,162	1,548	38.9000%	602	77,550	-
Feb-10	2,734,620	8,614	10,162	1,548	38.9000%	602	78,153	-

## 2005 - Plan Project 11 -- Special Waste Landfill Expansion - MC

Month	Plant Balance	Book Depreciation	Tax Depreciation	Temporary Difference	Income Tax Rate	Deferred Tax	Accumulated Deferred Taxes	Deferred Taxes on Retirements
						(	140,289	
Sep-09	2,282,981	6,158	10,868	4,710	38.9000%	1,832	142,121	22,369
Oct-09	2,282,981	6,158	10,868	4,710	38.9000%	1,832	143,953	22,369
Nov-09	2,282,981	6,158	10,868	4,710	38.9000%	1,832	145,785	22,369
Dec-09	4,607,107	7,949	98,029	90,080	38.9000%	35,041	180,826	22,369
Jan-10	4,607,107	9,741	24,037	14,296	38.9000%	5,561	186,387	22,369
Feb-10	4,607,107	9,741	24,037	14,296	38.9000%	5,561	191,948	22,369

2005 - Plan Project 12 -- Special Waste Landfill Expansion - CR

Month	Plant Balance	Book Depreciation	Tax Depreciation	Temporary Difference	Income Tax Rate	Deferred Tax	Accumulated Deferred Taxes	Deferred Taxes on Retirements
							160,329	
Sep-09	2,988,137	5,304	15,658	10,354	38.9000%	4,028	164,357	-
Oct-09	2,988,137	5,304	15,658	10,354	38.9000%	4,028	168,385	-
Nov-09	2,988,137	5,304	15,658	10,354	38.9000%	4,028	172,413	-
Dec-09	4,730,568	6,850	81,002	74,152	38.9000%	28,845	201,258	536
Jan-10	4,730,568	8,397	24,966	16,569	38.9000%	6,445	207,703	536
Feb-10	4,730,568	8,397	24,966	16,569	38.9000%	6,445	214,148	536

## 2005 - Plan Project 13 -- Scrubber Refurbishment - TC1

Month	Plant Balance	Book Depreciation	Tax Depreciation	Temporary Difference	Income Tax Rate	Deferred Tax	Accumulated Deferred Taxes	Deferred Taxes on Retirements
							50,498	
Sep-09	850,100	2,564	8,029	5,465	38.9000%	2,126	52,624	73,550
Oct-09	850,100	2,564	8,029	5,465	38.9000%	2,126	54,750	73,550
Nov-09	850,100	2,564	8,029	5,465	38.9000%	2,126	56,876	73,550
Dec-09	850,100	2,564	8,029	5,465	38.9000%	2,126	59,002	73,550
Jan-10	850,100	2,564	7,834	5,270	38.9000%	2,050	61,052	73,550
Feb-10	850,100	2,564	7,834	5,270	38.9000%	2,050	63,104	73,550

2005 - Plan Project 14 -- Scrubber Refurbishment - CR6

Month	Plant Balance	Book Depreciation	Tax Depreciation	Temporary Difference	Income Tax Rate	Deferred Tax	Accumulated Deferred Taxes	Deferred Taxes on Retirements
							15,804	
Sep-09	308,507	1,147	1,700	553	38.9000%	215	16,019	9,075
Oct-09	308,507	1,147	1,700	553	38.9000%	215	16,234	9,075
Nov-09	308,507	1,147	1,700	553	38.9000%	215	16,449	9,075
Dec-09	308,507	1,147	1,700	553	38.9000%	215	16,664	9,075
Jan-10	308,507	1,147	1,587	440	38.9000%	171	16,835	9,075
Feb-10	308,507	1,147	1,587	440	38.9000%	171	17,006	9,075

2005 - Plan Project 15 -- Scrubber Refurbishment - CR5

Month	Plant Balance	Book Depreciation	Tax Depreciation	Temporary Difference	Income Tax Rate	Deferred Tax	Accumulated Deferred Taxes	Deferred Taxes on Retirements
							-	
Sep-09	-	-	-	-	38.9000%	-	-	-
Oct-09	-			-	38.9000%	on.	-	-
Nov-09	_	-	_	-	38.9000%	_	-	_
Dec-09	-	-	-	_	38.9000%	*27	-	
Jan-10	r	_	_	-	38.9000%	-	-	
Feb-10	_	-	-	_	38.9000%	-	-	-

2005 - Plan Project 16 -- Scrubber Improvements - TC1

Month	Plant Balance	Book Depreciation	Tax Depreciation	Temporary Difference	Income Tax Rate	Deferred Tax	Accumulated Deferred Taxes	Deferred Taxes on Retirements
							809,830	
Sep-09	7,361,078	22,206	67,072	44,866	38.9000%	17,453	827,283	26,166
Oct-09	7,361,078	22,206	67,072	44,866	38.9000%	17,453	844,736	26,166
Nov-09	7,361,078	22,206	67,072	44,866	38.9000%	17,453	862,189	26,166
Dec-09	7,361,078	22,206	67,072	44,866	38.9000%	17,453	879,642	26,166
Jan-10	7,361,078	22,206	65,992	43,786	38.9000%	17,033	896,675	26,166
Feb-10	7,361,078	22,206	65,992	43,786	38.9000%	17,033	913,706	26,166

2006 - Plan Project 18 -- TC 2 AQCS Equipment

Month	Plant Balance	Book Depreciation	Tax Depreciation	Temporary Difference	Income Tax Rate	Deferred Tax	Accumulated Deferred Taxes	Deferred Taxes on Retirements
Sep-09	<del></del>	-	*	-	38.9000%	-	-	₩.
Oct-09	**	-	-	_	38.9000%	-	_	ger.
Nov-09	-		-	-	38.9000%	_	-	_
Dec-09	_	_	_	-	38.9000%	-	-	-
Jan-10	-	,,	-	-	38.9000%	-	_	•
Feb-10		_	_	_	38.9000%	-	~	_

## 2006 - Plan Project 19 - Sorbent Injection, Mill Creek & Trimble 1

Month	Plant Balance	Book Depreciation	Tax Depreciation	Temporary Difference	Income Tax Rate	Deferred Tax	Accumulated Deferred Taxes	Deferred Taxes on Retirements
							107,964	
Sep-09	3,277,721	9,888	31,300	21,412	38.9000%	8,329	116,293	-
Oct-09	3,277,721	9,888	31,300	21,412	38.9000%	8,329	124,622	-
Nov-09	3,277,721	9,888	31,300	21,412	38.9000%	8,329	132,951	_
Dec-09	3,277,721	9,888	31,300	21,412	38.9000%	8,329	141,280	-
Jan-10	3,277,721	9,888	30,713	20,825	38.9000%	8,101	149,381	-
Feb-10	3,440,076	9,832	32,092	22,260	38.9000%	8,659	158,040	-

2006 - Plan Project 20 - Mercury Monitors, all plants

Month	Plant Balance	Book Depreciation	Tax Depreciation	Temporary Difference	Income Tax Rate	Deferred Tax	Accumulated Deferred Taxes	Deferred Taxes on Retirements
							8,931	
Sep-09	2,050,346	5,296	19,854	14,558	38.9000%	5,663	14,594	-
Oct-09	2,050,346	8,867	19,854	10,987	38.9000%	4,274	18,868	-
Nov-09	2,050,346	8,867	19,854	10,987	38.9000%	4,274	23,142	46
Dec-09	2,050,346	8,867	19,854	10,987	38.9000%	4,274	27,416	-
Jan-10	2,050,346	8,867	13,494	4,627	38.9000%	1,800	29,216	-
Feb-10	2.050.346	8.867	13.494	4.627	38.9000%	1.800	31.018	-

2006 - Plan Project 21 -- Particulate Monitors, Mill Creek

Month	Plant Balance	Book Depreciation	Tax Depreciation	Temporary Difference	Income Tax Rate	Deferred Tax	Accumulated Deferred Taxes	Deferred Taxes on Retirements
							56,738	
Sep-09	397,151	1,361	4,088	2,727	38.9000%	1,061	57,799	-
Oct-09	397,151	1,361	4,088	2,727	38.9000%	1,061	58,860	-
Nov-09	397,151	1,361	4,088	2,727	38.9000%	1,061	59,921	-
Dec-09	397,151	1,361	4,088	2,727	38.9000%	1,061	60,982	-
Jan-10	397,151	1,361	4,027	2,666	38.9000%	1,037	62,019	_
Feb-10	397,151	1,361	4,027	2,666	38.9000%	1,037	63,057	-

## LOUISVILLE GAS AND ELECTRIC COMPANY

## Response to Information Requested in Appendix B of Commission's Order Dated July 13, 2010

Case No. 2010-00242

#### **Question No. 4**

Witness: Shannon L. Charnas

- Q-4. Refer to ES Form 2.50, Pollution Control Operations & Maintenance Expenses, for the September 2009 through February 2010 expense months. For each expense account number listed on this schedule, explain the reason(s) for any change in the expense levels from month to month if that change is greater than plus or minus 10 percent.
- A-4. Attached please find a schedule showing the changes in the operations and maintenance expense accounts for September 2009 through February 2010 expense months. The changes in the expense levels are reasonable and occurred as a part of routine plant operations and maintenance or normal annual testing expenses.

Monthly variances in the NOx operation expenses, accounts 506104 and 506105, reflect normal SCR operations that will fluctuate with generation and coal quality. The variances for account 506104 are driven by the purchase and delivery timing of the raw consumable material. The amount of consumable materials needed was reduced because Trimble County was offline for a scheduled turbine outage from 9/26/2009 through 11/24/2009, and was placed in unavailable status from 1/18/2010 through 2/3/2010 for repairs due to hydrogen seal leakage and vibration. The large increase in account 506105 in September 2009 is the result of the normal annual SCR catalyst testing.

Fluctuations in the NOx maintenance expenses, account 512101, are the result of routine monthly maintenance on the SCRs. December 2009 is higher than a typical month based solely on the schedule of work planned and completed by the plants.

Fluctuations in the scrubber operation expenses, account 502006, are the result of regular operation of the Trimble County Unit 1 FGD. These are variable production expenses and will fluctuate with generation, coal quality and the SO<sub>2</sub> removal rate. Since Trimble County Unit 1 was offline during much of October,

Response to Question No. 4
Page 2 of 2
Charnas

November and January, actual expenses were less than the amount in base rates, thus producing credits in those periods.

Fluctuations in sorbent injection operation expenses, account 506109, are the result of on-going system operation. These costs were reduced in October due to a scheduled outage at Trimble County. Fluctuations in sorbent injection maintenance expenses, account 512102, are the result of normal system maintenance.

# LOUISVILLE GAS AND ELECTRIC COMPANY ENVIRONMENTAL SURCHARGE REPORT

Pollution Control - Operations & Maintenance Expenses

O&M Expense Account	Sep-09	Oct-09	% Change from Prior Period	Nov-09	% Change from Prior Period	Dec-09	% Change from Prior Period	Jan-10	% Change from Prior Period	Feb-10	% Change from Prior Period
2001 Plan											
506104 NOx Operation Consumables	291,838.15	191,065.38	-35%	163,138.92	-15%	233,837.58	43%	187,633.30	-20%	191,094.70	2%
506105 NOx Operation Labor and Other	27,128.15	5,722.96	%61-	7,240.29	27%	8,792.93	21%	7,275.36	-17%	8,093.06	11%
512101 NOx Maintenance	47,574.83	42,777.01	-10%	19,977.00	-53%	146,025.77	631%	31,828.62	%8 <i>L</i> -	22,199.53	-30%
Total 2001 Plan O&M Expenses	366,541.13	239,565.35	-35%	190,356.21	-21%	388,656.28	104%	226,737.28	45%	221,387.29	-2%
2005 Plan											
502006 Scrubber Operations	14,985.05	(54,507.28)	-464%	(30,851.03)	-43%	17,723.27	-157%	(6,057.00)	-134%	21,866.47	-461%
512005 Scrubber Maintenance	-	•	%0	-	%0	ŧ	%0	-	%0		%0
501201 Ashpond Dredging Expense	171,471.17	171,471.16	0%	171,471.17	1 %0	171,471.16	0% 1	171,471.17	0% 1	171,471.16	%0
Total 2005 Plan O&M Expenses	186,456.22	116,963.88	-37%	140,620.14	20%	189,194.43	35%	165,414.17	-13%	193,337.63	11%
2006 Plan											
506109 Sorbent Injection Operation	47,692.16	14,638.08	%69-	39,014.23	167%	33,812.92	-13%	42,827.48	27%	52,776.73	23%
512102 Sorbent Injection Maintenance	1,015.94	58.08	-94%	72.61	25%	1	-100%	427.98	%0	921.17	115%
506110 Mercury Monitors Operation	1		%0	,	%0	,	%0	1	%0	1	%0
512103 Mercury Monitors Maintenance		-	%0	ı	%0	-	%0	,	%0	,	%0
502006 Scrubber Operations	•	•	%0		%0	1	%0	1	%0	1	%0
512005 Scrubber Maintenance	1		%0	ı	%0	1	%0	ı	%0	-	%0
506104 Nox Operation Consumables	•	ı	%0	-	%0	1	%0	'	%0		%0
506105 Nox Operation - Labor and Other		,	%0	ı	%0	'	%0		%0	-	%0
512101 Nox Maintenance		•	%0	,	%0	'	%0	ı	%0	•	%0
506001 Precipitator Operation	•	,	%0	,	%0	٠	%0	·	%0	1	%0
506111 Activated Carbon	,	•	%0	,	%0	1	%0	'	%0		%0
512011 Precipitator Maintenance	,	1	%0		%0	,	%0	,	%0	'	%0
Total 2006 Plan O&M Expenses	48,708.10	14,696.16	-20%	39,086.84	166%	33,812.92	-13%	43,255.46	78%	53,697.90	24%
2009 Plan											
502012 Precipitator Operation	,	_	%0	-	%0	,	%0	-	%0	1	%0
512105 Activated Carbon	•	-	%0	•	%0	•	%0	•	%0		%0
Adjustment for CCP Disposal in Base Rates (ES Form 2.51)	ı	1	%0	٠	%0	-	%0	,	%0	,	%0
Total 2009 Plan O&M Expenses		•	%0	-	%0	1	%0	-	%0	-	%0

1 Amount rounds to less than 1%

v.				
	•			

#### LOUISVILLE GAS AND ELECTRIC COMPANY

## Response to Information Requested in Appendix B of Commission's Order Dated July 13, 2010

Case No. 2010-00242

#### **Question No. 5**

Witness: Shannon L. Charnas

- Q-5. In Case No. 2000-00439, the Commission ordered that LG&E's cost of debt and preferred stock would be reviewed and re-established during the six-month review case. Provide the following information as of February 28, 2010:
  - a. The outstanding balances for long-term debt, short-term debt, preferred stock, and common equity. Provide this information on total company and Kentucky jurisdictional bases.
  - b. The blended interest rates for long-term debt, short-term debt, and preferred stock. Include all supporting calculations showing how these blended interest rates were determined. If applicable, provide the blended interest rates on total company and Kentucky jurisdictional bases. For each outstanding debt listed, indicate whether the interest rate is fixed or variable.
  - c. LG&E's calculation of its weighted average cost of capital for environmental surcharge purposes.
- A-5. a. Please see the attachment. There was no preferred stock as of February 28, 2010, therefore it is not listed in the attached schedule.
  - b. Please see the attachment. There was no preferred stock as of February 28, 2010, therefore it is not listed in the attached schedule.
  - c. Please see the attachment. LG&E is utilizing a return on equity of 10.63% as agreed to and approved by the Commission in its July 30, 2010 Order in Case No. 2009-00549.

## Louisville Gas and Electric Company Outstanding Balances - Capitalization As of February 28, 2010

	1	2 Outstanding Balance Total Company	3 Outstanding Balance Electric Only 79.54%
1	Long-Term Debt	896,104,000	712,761,122
2	Short-Term Debt	129,748,400	103,201,877
3	Common Equity	1,286,160,186	1,023,011,812

## Louisville Gas and Electric Company Blended Interest Rates As of February 28, 2010

		1 Blended Interest Rate Total Company
1	Long-Term Debt	5.13%
2	Short-Term Debt	0.20%

## LOUISVILLE GAS AND ELECTRIC COMPANY ANALYSIS OF THE EMBEDDED COST OF CAPITAL AT February 28, 2010

			L	ONG-TERM DEB	<u></u>				
						Annualized Cost			
					Amortized Debt	Amortized Loss-	Letter of Credit		Embedded
	Due	Rate	Principal	Interest/(Income)	Issuance Expense	Reacquired Debt	and other fees	Total	Cost
Pollution Control Bonds -									
Jefferson Co 2000 Series A	05/01/27	5 375% *	25,000,000			117,881	-	1.461,631	5 847
Trimble Co 2000 Series A	08/01/30	0.240% *	83,335,000	200,004	38,707	143,700	305,611 d	688.022	0 826
Jefferson Co 2001 Series A	09/01/27	0 275% *	10,104,000	27,786	20,393		35,516 d	83.695	0 828
Jefferson Co 2001 Series A	09/01/26	0 630% *	22,500,000	141,750	9,924	77,424	22,500 b	251,598	1 118
Trimble Co 2001 Series A	09/01/26	0.630% *	27,500,000	173,250	10,790	65,400	27,500 в	276.940	1 0079
Jefferson Co 2001 Series B	11/01/27	0.750% *	35,000,000	262.500	10,995	49,056	35,000 в	357,551	1 022
Trimble Co 2001 Series B	11/01/27	0 750% *	35,000,000	262,500	10,997	48,864	35,000 в	357.361	1 0219
Trimble Co 2002 Series A	10/01/32	0 227% *	41,665,000	94,580	37,221	55,812	176,056 a	363,669	0 873
Louisville Metro 2003 Series A	10/01/33	0 300% *	128,000,000	3 384,000		312,614	127,649	824.263	0 644
Louisville Metro 2003 Series A	10/01/33	0 300% *	(128,000,000)	3 (384,000)		· •	•	(384.000)	0 300
Louisville Metro 2005 Series A	02/01/35	5.750% *	40,000,000			96,444		2.396,444	5 991
Trimble Co 2007 Series A	06/01/33	4 600%	60,000,000	2.760.000	47,192	6,567	18.270 a	2.832.029	4 720
Louisville Metro 2007 Series A	06/01/33	5 625% *	31,000,000		,	41,417	,	1.785.167	5 759
Louisville Metro 2007 Series B	06/01/33	0 300% *	35,200.000			27.328	10.718 a	143,646	0 408
Louisville Metro 2007 Series B	06/01/33	0 300% *	(35,200,000)			21.020	10,110 a	(105,600)	0.300
Called Bonds	00/01/00	0 000 //	(00,200,000)	0 (100,000)	-	167,868 2		167,868	0.000
Total External Debt			411,104,000	9,309,870	186,219	1.210,375	793,820	11,500,284	1.283
Interest Rate Swaps:									
JP Morgan Chase Bank	11/01/20	1		4,425.831				4.425.831	
Morgan Stanley Capital Services	10/01/33	1		1,123,782		•	-	1.123,782	
Morgan Stanley Capital Services	10/01/33	1		1,119,942		-		1.119,942	
Bank of America	10/01/33	1		1,135,942				1,135,942	
Interest Rate Swaps External Debt	10/01/00	•		7,805,497		-		7,805,497	0.871
				1,000,500					
Notes Payable to Fidelia Corp.	01/16/12	4 330% 4 550%	25,000,000	1,082,500	*	•	•	1.082,500	4 330
Notes Payable to Fidelia Corp Notes Payable to Fidelia Corp	04/30/13 08/15/13	5.310%	100.000.000 100,000.000	4,550,000 5,310,000	•	•	•	4,550,000 5,310,000	4 550° 5 310°
		6.480%		3,240.000	•	•	•		6 480
Notes Payable to Fidelia Corp. Notes Payable to Fidelia Corp	11/23/15 07/25/18	6.480%	50,000,000 25.000,000	1,552,500	*	•	•	3,240,000 1,552,500	6 210
Notes Payable to Fidelia Corp	11/26/22	5.720%	47,000,000	2,688,400	•	•	•	2.688.400	5.720
Notes Payable to Fidelia Corp Notes Payable to Fidelia Corp	04/13/31	5.720%	68,000,000	4.032,400	•		•	4,032,400	5 930
Notes Payable to Fidelia Corp	04/13/37	5 980%	70,000,000	4,186,000	•	-		4,186,000	5.980
Total Internal Debt	04113/3/	J.50070	485,000,000	26,641,800				26,641,800	2.973
rotal mediai Debi			460,000,000	20,041,000		-		20,041,000	2.973
		Total	896,104,000	43.757.167	186.219	1,210,375	793,820	45,947,581	5,127

***************************************	· · · · · · · · · · · · · · · · · · ·		SHO	ORT TERM DEBT		······································	***************************************		
						nnualized Cost			
	Maturity	Rate	Principal	Interest	Expense	Loss	Premium	Total	Embedded Cost
Notes Payable to Associated Company	NA	0 200% *	129,748,400	259,497	-		-	259,497	0 200%
		Total	129,748,400	259,497				259,497	0.200%
Embedded Cost of Total Debt			1,025,852,400	44,016,664	186,219	1,210,375	793,820	46,207,078	4.504%

*	Composite	rale	at	end	of	current	month	
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1 Additional interest due to Swap Agreen	nents:		Expiration of Swap	Fixed LG&E Swap	Fixed LG&E Swap	Variable Counterparty
	Underlying Debt Being Hedged	Notional Amount	Agreement	Position	Position	Swap Position
	Series Z - PCB	83,335,000	11/01/20	5 495%	5.495%	BMA Index
	Series GG - PCB	32.000,000	10/01/33	3 657%	3 657%	68% of 1 mo LIBOR
	Series GG - PCB	32,000,000	10/01/33	3 645%	3 645%	68% of 1 mo LIBOR
	Series GG - PCB	32,000,000	10/01/33	3 695%	3 695%	68% of 1 mo LIBOR
		179 335 000				

- 2 Call premium and debt expense is being amortized over the remaining life of bonds due 6/1/15, 7/1/13 and 8/1/17
- 3 Reacquired bonds, which net to zero as they are also included in Short Term Debt Notes Payable to Associated Company
- 4 Remarketed bonds, issued at long term fixed rate.
- a Insurance premiums annualized based on actual involces b Remarketing fee = 10 basis points c Remarketing fee = 25 basis points d Combination of a and c

Louisville Gas and Electric Company Outstanding Balances - Adjusted Electric Capitalization February 28, 2010

<del>-</del>	2 Electric Only	3 Capital Structure	4 Cost Rate	5 Weighted Average Cost of Capital	6 Tax Gross-up Factor	7 Weighted Average Cost of Capital with Equity Gross-up
1 Long-Term Debt	729,920,443	38.76%	5.13%	1.99%		1.99%
2 Short-Term Debt	105,685,463	5.61%	0.20%	0.01%		0.01%
3 Common Equity	1,047,639,599	55.63%	10.63%	5.91%	0.55	9.18%
4 Total	1,883,245,504			7.91%		11.18%
	Ľ.	Rate of Return (ROR) Grossed Up:	ed Up:	11.18%		

Weighted Cost of Capital Grossed up for Income Tax Effect {ROR + (ROR - Debt rate) x [TR/(1-TR)]}

See tax rate (TR) calculation on 5(c) page (2)

# ECR - Gross-up Revenue Factor & Composite Income Tax Calculation 2010

(1) Assume pre-tax income of	2010 Federal & State Production Credit W/ 6% 2010 State Tax Rate Included \$ 100.0000	
<ul><li>(2)</li><li>(3) State income tax (see below)</li></ul>	5.4896	(37)
(4)		
(5) Taxable income for Federal income tax		
<ul><li>(6) before production credit</li><li>(7)</li></ul>	94.5104 9%	(1) - (3)
(8) Less: Production tax credit	8.5059	(6)*(7)
(9) (10) Taxable income for Federal income tax	86.0044	(6) - (8)
(11) (12) Federal income tax	30.1015	(10)*35%
(13)		MENTAL P
(14) Total State and Federal income taxes		
(15)	\$ 35.5912	_ (3)+(12)
<ul><li>(16)</li><li>(17) Gross-up Revenue Factor</li></ul>	64.4088	100-(15)
(18)	***************************************	
(19) Therefore, the composite rate is:		
(20) Federal	30.1015%	(12)/100
(21) State	5.4896%	(3)/100
(22) Total	35.5912%	(20)+(21)
<ul><li>(23)</li><li>(24)</li><li>(25)</li><li>(26)</li><li>(27)</li></ul>		
(28) <u>State Income Tax Calculation</u>		
(29) Assume pre-tax income of	\$ 100.0000	
(30)	0.5050	
(31) Less: Production tax credit	8.5059	_ (8)
(32) (33) Taxable income for State income tax	91.4941	(29) - (31)
(34)	< 00000	
(35) State Tax Rate	6.0000%	
(36) (37) State Income Tax	5.4896	(33)*(35)

## LOUISVILLE GAS AND ELECTRIC COMPANY

## Response to Information Requested in Appendix B of Commission's Order Dated July 13, 2010

Case No. 2010-00242

## Question No. 6

Witness: Robert M. Conroy

- Q-6. Provide the dollar impact the over-/under-recovery will have on the average residential customer's bill for the requested recovery period.
- A-6. Based upon recovering the net under-recovered position of \$4,773,629 over six months, the ECR billing factor for a residential customer using 1,000 kWh will increase by approximately \$0.95 per month, using rates and adjustment clause factors in effect for the August 2010 billing month.